

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ERICA CARDENAS,
Plaintiff,

v.

IMS FUND LLC,
Defendant.

Case No. 1:24-cv-4041

**NOTICE OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

TO: Opposing Counsel

PLEASE TAKE NOTICE that upon the annexed affidavit of Movant in support of this motion and the Certificate of Good Standing issued by the State Bar of Texas annexed thereto, I, Minh-Tam (Tammy) Tran, move this Court pursuant to Rule 1.3(c) of the local Rules of the United States District Courts for the Southern District of New York for an order allowing the admission of movant, Principal of the law firm of Tammy Tran Attorneys at Law, LLP (d/b/a The Tammy Tran Law Firm) and a member in good standing of the State Bar of Texas, as attorney *pro hac vice* to argue and/or try this case in whole or in part as co-counsel for Defendant IMS Fund LLC. There are no pending disciplinary proceedings against me in any state or federal court.

DATED: June 14, 2024

Respectfully submitted,

By: /s/ Minh-Tam Tran

Minh-Tam (Tammy) Tran
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CO-COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I, Minh-Tam Tran, hereby certify that on this 14th day of June 2024, I caused the foregoing Memorandum of Law in Support of Motion to Dismiss Complaint to be served via the Court's ECF Filing System and through that system, it will be served upon registered counsel by email.

/s/ Minh-Tam Tran
Minh-Tam Tran